

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR (DRAFT PERMIT) No. F-05-046

GUSHER PUMPS, INC.

115 INDUSTRIAL DRIVE, WILLIAMSTOWN, KY 41097

MARCH 3, 2006

MARK LABHART, REVIEWER

SOURCE I.D. #: 021-081-00022

SOURCE A.I. #: 55696

ACTIVITY #: APE20050001

SOURCE DESCRIPTION:

Gusher Pumps Incorporated is a Division of Ruthman Pump & Engineering. The source makes a variety of centrifugal pumps. This permit covers Plant II, pump assembly, which has a minimal number of emission units. There are two (2) spray booths located at this source. The unrestricted Potential-To-Emit, (PTE) of the spray booths is greater than major source thresholds. However, actual emissions have been much less, and the source is requested limitations on the PTE to remain a minor source. There are no other significant emission units at this source. Insignificant activities included in the permit are an aqueous parts washer utilizing caustic soap and some machining operations.

COMMENTS:

- Spray booth PTE was calculated based on material balances.
- The source is not subject to 40 CFR Part 63, Subpart Mmmm: Surface Coating of Miscellaneous Metal Parts and Products. The Federally Enforceable permit conditions will limit this source to minor source status and preclude the applicability of Subpart Mmmm.
- The source is not subject to 401 KAR 59:225: New miscellaneous metal parts and products surface coating operations; as they have accepted Federally Enforceable permit conditions which limit them to area source status. Regulation 59:225 is not applicable to minor sources which are located in a county designated attainment for ozone.

EMISSION AND OPERATING CAPS DESCRIPTION:

Gusher Pumps has voluntarily requested permit limitations on the potential to emit. The source will limit VOC emissions to 20 TPY or less, and HAP emissions will be limited to 9 TPY for any single HAP.

OPERATIONAL FLEXIBILITY:

The source is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.